

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

H-Food Holdings, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90586 (ARP)

(Jointly Administered)

**STIPULATION REGARDING LA PALMA MILLER PHASE III'S
DEADLINE TO OBJECT TO DEBTORS' SECOND OMNIBUS
MOTION AUTHORIZING REJECTION OF CERTAIN UNEXPIRED
LEASES AND EXECUTORY CONTRACTS IN ANAHEIM, CALIFORNIA**

[Relates to Objection Deadline for the Motion Filed at Docket No. 556]

This *Stipulation Regarding La Palma Miller Phase III's Deadline to Object to Debtors' Second Omnibus Motion Authorizing Rejection of Certain Unexpired Leases and Executory Contracts Located in Anaheim, California* (the "Stipulation") is entered by and between the above captioned debtors and debtors in possession (collectively, the "Debtors") and La Palma Miller Phase III, the lessor of the Anaheim property (the "Lessor") (collectively, the "Parties").

WHEREAS, on February 28, 2025, the Debtors filed the *Second Omnibus Motion of Debtors for Entry of an Order (I) Authorizing (a) Rejection of Certain Unexpired Leases and Executory Contracts in Anaheim, California and (b) Abandonment of Certain Personal Property, if any, and (II) Granting Related Relief* [Docket No. 556] (the "Anaheim Rejection Motion");

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: HFS Sub, LLC (8177); H-Food Holdings, LLC (6072); Hearthside Food Solutions, LLC (8653); Peacock Engineering Company II, LLC (N/A); HFS Matterhorn Topco, Inc. (0765); Matterhorn Parent, LLC (4445); Matterhorn Intermediate, LLC (1574); Matterhorn Buyer, LLC (0335); Hearthside USA - Corporate, Inc. (3174); Hearthside Holdco, LLC (6206); Hearthside Finance Company, Inc. (8294); Interbake Foods, LLC (7640); Ryt-way Midco, LLC (4388); Hearthside USA, LLC (7655); Hearthside USA – CPG Partners, LLC (2282); Oak State Products, LLC (1822); Standard Functional Foods Group, LLC (4160); Quality Bakery Products, LLC (0528); Toll Packaging Services LLC (5955); Ryt-way Industries, LLC (0783); Matterhorn Sub, LLC (N/A); Peacock Foods LLC (N/A); and Hearthside USA – Produce & Foodservice, LLC (0783). The Debtors' service address is 3333 Finley Road, Suite 800, Downers Grove, IL 60515.

WHEREAS, the current deadline to file and serve any objection to the Anaheim Rejection Motion is March 21, 2025 (the “Objection Deadline”);

WHEREAS, the Lessor has requested an extension of the Objection Deadline with respect to the Anaheim Rejection Motion;

WHEREAS, the Debtors continue to negotiate certain outstanding issues related to Anaheim Rejection Motion with the Lessor.

NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES AS FOLLOWS:

1. The Objection Deadline with respect to the Anaheim Rejection Motion is extended to March 28, 2025 at 4:00 p.m. prevailing Central Time, solely with respect to the Lessor.

[Remainder of Page Intentionally Left Blank]

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: March 21, 2025

M. RYAN PINKSTON,

/s/ M. Ryan Pinkston

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*CO-COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION*

CERTIFICATE OF SERVICE

I certify that on March 21, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins

John F. Higgins